

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

William Dew

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
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2020 JAN 10 P 9:17

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

S Columbia Terrace, LLC

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	William Dew
	Street Address	9 Columbia Terrace, Apt 4C
	County, City	Bergen, Edgewater
	State & Zip Code	New Jersey 07020
	Telephone Number	646 752 3180

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name S Columbia Terrace, LLC
 Street Address 208 Truman Drive
 County, City Bergen, Cresskill
 State & Zip Code New Jersey, 07626

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Questions ☐ Diversity of Citizenship
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Fair Housing Act: See attached

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C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? See attached

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Division on Civil Rights Verified complaint

B. What date and approximate time did the events giving rise to your claim(s) occur? See attached

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C. Facts: See attached plaintiff's certification of facts

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

See attached plaintiff's certification of facts

See attached plaintiff's certification of facts

Housing investigator Ms. Adriana Tovar

See attached Ms. Delacruz certification

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Emotional distress, depression, humiliation and anxiety

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

PRELIMINARY INJUNCTION

Preliminary relief enjoining the state court eviction pending the conclusion of The State of New Jersey Office of The Attorney General Department Division on Civil Rights investigation until this matter can be heard.

IRREPARABLE HARM

If the Court does not enjoin the pending eviction, the Plaintiffs will be rendered homeless on January 31 2020 and lose his section 8 Voucher.

The Plaintiffs could reapply for entrance into the Program, or for other federal or state-funded housing assistance programs. However, during the application process—which will take a significant amount of time—the Plaintiffs would still remain homeless

SEE ATTACHED

Northeast New Jersey Legal Services letter of support to the court

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10 day of January, 20 20.

Signature of Plaintiff William Dew
Mailing Address 9 Columbia Terrace, Apt 4C
Edgewater, NJ 07020 1260

Telephone Number 646 752 3180
Fax Number (if you have one) _____
E-mail Address Dew88@aol.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: William Dew